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June 27, 2022

**VIA ECF**

Honorable Vera M. Scanlon  
United States District Court  
Eastern District of New York  
814 Federal Plaza  
Central Islip, New York 11722-4451

Re: Payamps v. City of New York et al.,  
22-CV-0563 (AMD) (VMS)


Your Honor:

I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York ("City"), Mayor Bill de Blasio, New York City Police Commissioner Dermot Shea, New York City Police Department ("NYPD") Chief of Department Terence Monahan, Police Officer Daniel Auguste, and Police Officer Corey Johnson (collectively "Defendants") in the above-referenced matter. For the reasons set forth below, I write to respectfully request that the Court *sua sponte* enlarge the time for defendant Inspector Jesse Lance to answer or otherwise respond to the complaint from June 27, 2022 until July 27, 2022. This is defendant City's third request for an extension of this deadline.

This office requests that the Court extend the time for defendant Lance to obtain legal representation and answer or otherwise respond to the Complaint. On June 27, 2022, this Office decided not to extend representation to defendant Lance. As such, defendant Lance remains unrepresented in this proceeding. A 30-day enlargement of time would afford the individual defendant to secure legal counsel and respond to the Complaint.

Accordingly, the City respectfully requests a *sua sponte* enlargement of time for defendant Lance, until July 27, 2022, to obtain legal representation and answer or otherwise respond to the complaint.

Defendants thank the Court for its time and consideration of this request.

By: /s/   
Michael Pesin-Virovets  
*Senior Counsel*

cc: **By ECF**  
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